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BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF UTAH

COMPLAINANT:

UTAH INSURANCE DEPARTMENT

RESPONDENT:

IDS PROPERTY CASUALTY INSURANCE CO.
3500 Packerland Drive
DePere, WI 54115
Utah Org. Id. No. 13392

**STIPULATION
&
ORDER**

Docket No.

2007-116 PC

Enf. Case No. 2019

STIPULATION

1. Respondent, IDS Property Casualty Insurance Company, is an insurer domiciled in the State of Wisconsin and authorized to do business in the State of Utah, Utah Organization Identification No. 15670.

2. Respondent stipulates with the Complainant, Utah Insurance Department, as follows:
- a. If a hearing were held, witnesses called by the Complainant could offer and introduce evidence that would support the Findings of Fact herein;
 - b. Respondent admits the Findings of Fact and Conclusions made therefrom;
 - c. Respondent stipulates to the summary entry of the Order herein which shall be

in lieu of other administrative proceedings by Complainant in this matter; and

d. Respondent and Complainant have negotiated the terms of the Order entered herein and Respondent agrees to its entry and further agrees to be bound by all its terms.

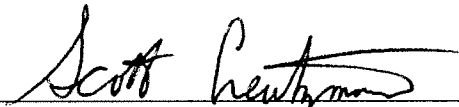
3. Respondent is aware of its right to a hearing at which it may be represented by counsel, present evidence and cross-examine witnesses. Respondent has irrevocably waived its right to such hearing and to any appeal related thereto.

4. Respondent admits the jurisdiction of the State of Utah Insurance Commissioner as to all matters herein.

5. Respondent is acting herein free from any duress or coercion of any kind or nature, having been advised fully as to its rights set forth herein.

6. Respondent acknowledges that the issuance of this Order by the Commissioner is solely for the purpose of disposition of the matter entitled herein.

DATED this 16th day of October, 2007.


IDS PROPERTY CASUALTY INSURANCE
COMPANY
Scott Creutzmann, General Counsel


UTAH INSURANCE DEPARTMENT
M. Gale Lemmon, Assistant Attorney General

Based upon the foregoing Stipulation and information in the file, the Presiding Officer makes the following Findings of Fact:

FINDINGS OF FACT

1. During the period of about May 2005 through April 2007, Respondent conducted a marketing campaign in the State of Utah in which Respondent solicited requests for quotes for automobile insurance from residents of the State of Utah who were members of the Delta SkyMiles program and were offered 500 Delta SkyMiles for each quote requested.

2. Respondent paid \$20.00 to Delta Air Lines for each qualified person who requested a quote from the Respondent. The number of Utah residents requesting such quotes during the marketing campaign was 530. Respondent sold 44 automobile insurance policies to Utah residents as a result of the marketing campaign.

3. The acquisition cost of the SkyMiles provided to Utah residents requesting quotes exceeded \$3.00 per person.

Based upon the foregoing Stipulation and Findings of Fact, the Presiding Officer enters the following Conclusions of Law:

CONCLUSIONS OF LAW

1. In paying for access to membership of an organization on the basis of the number of qualified requests for quotes received rather than the number of members, Respondent violated Utah Code Annotated § 31A-23a-504(4)(c)

2. In providing an inducement with an acquisition cost exceeding \$3.00 to receive a quote for insurance, Respondent violated Utah Administrative Code Rule R590-154-11.A.

Based upon the foregoing Stipulation, Findings of Fact and Conclusions of Law, the Presiding Officer herewith enters the following Order:

ORDER

IT IS HEREBY ORDERED:

1. Respondent is assessed an administrative forfeiture in the amount of \$15,000.00, to be paid within 30 days of the date of this Order.

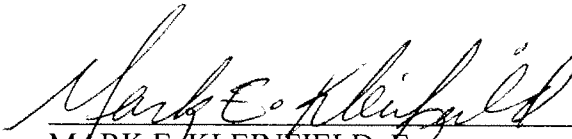
NOTIFICATION

Respondent is hereby notified that failure to abide by the terms of this Order may subject it to further penalties, including additional forfeitures of up to \$5,000.00 per violation and the suspension or revocation of your license, and the filing of an action to enforce this Order in the District Court, which may impose penalties of up to \$10,000.00 per day for continued violation.

You are further notified that other jurisdictions in which you may be licensed may require that you report this action to them.

DATED this 22nd day of October, 2007.

D. KENT MICHIE
INSURANCE COMMISSIONER



MARK E. KLEINFELD, Esq.
Administrative Law Judge
Utah Insurance Department
State Office Building, Room 3110
Salt Lake City, Utah 84114
Telephone (801) 538-3800

CERTIFICATE OF MAILING

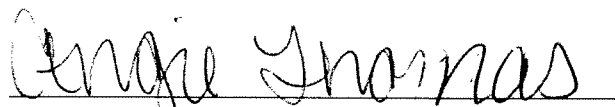
I do hereby certify that on this date I mailed, by regular mail, postage prepaid, a true and correct copy of the attached:

STIPULATION
&
ORDER

To the following:

IDS PROPERTY CASUALTY INSURANCE CO
3500 Packerland Dr
DePere, WI 54115

DATED this 22nd day of October, 2007.



Angie Thomas

Court Clerk

Utah Department of Insurance
State Office Building, Room 3110
Salt Lake City, UT 84114-6901

UTAH Invoice

Page 1

Printed Date: October 22, 2007

Invoice Date: October 22, 2007
Balance Due: \$15,000.00
Due Date: November 21, 2007
Invoice ID: 353882

IDS PROPERTY CASUALTY INSURANCE COMPANY
3500 PACKERLAND DRIVE
DEPERE WI 54115

Item Description	Amount
Monetary Penalty Company	\$15,000.00
Original Amount Due	\$15,000.00

UTAH Invoice

Printed Date: October 22, 2007

Invoice Date: October 22, 2007
Balance Due: \$15,000.00
Due Date: November 21, 2007
Invoice ID: 353882

Make checks payable to: Utah Insurance Department

Send payment to:

Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114-6901

Detach and Return with Payment